

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

GREGORY GOODWIN,	)	
	)	
Plaintiff,	)	Civil Action No. 05-CV-161 (Erie)
	)	
v.	)	Judge Maurice B. Cohill, Jr.
	)	
ACCURIDE ERIE, L.P.,	)	ELECTRONIC FILING
	)	
Defendant.	)	

**DEFENDANT’S CONSENTED-TO MOTION FOR EXTENSION  
OF TIME TO FILE MOTION FOR SUMMARY JUDGMENT**

NOW COMES Defendant Accuride Erie, L.P., (“Defendant”), by and through its counsel, and files the following Consented-To Motion for Extension of Time to File Motion for Summary Judgment, stating as follows:

1. On or about May 13, 2006, this Court issued a Revised Case Management Order providing inter alia, that discovery closed on July 7, 2006, and summary judgment motions were due by August 10, 2006.

2. The recent departure of two associate attorneys has drastically increased the workload of Defendant’s counsel.

3. In light of the recently increased workload of Defendant’s counsel, Defendant requests an extension of the deadline for filing motions for summary judgment for 21 days, until August 31, 2006.

4. Defendant’s counsel has consulted with Plaintiff’s counsel, and Plaintiff’s counsel has consented to the granting of a 21 day extension of time to file summary judgment motions.

WHEREFORE, Defendant respectfully requests that this Court issue an Order in the form attached, granting a 21 day extension of the deadline for filing motions for summary judgment, until August 31, 2006, and extending the deadline for filing responses to motions for summary judgment by 21 days, until September 29, 2006.

Respectfully submitted,

JACKSON LEWIS LLP

By: /s/Mark Goldner

Martin J. Saunders

PA ID #19940

saunderm@jacksonlewis.com

Mark Goldner

PA ID #75938

goldnerm@jacksonlewis.com

One PPG Place, 28th Floor

Pittsburgh, PA 15222

Phone (412) 232-0404

Fax (412) 232-3441

ATTORNEYS FOR DEFENDANT

Dated: August 2, 2006

CERTIFICATE OF SERVICE

I hereby certify that on August 2, 2006, I electronically filed the foregoing *Consented-To Motion for Extension of Time to File Motion for Summary Judgment* with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following:

Joseph H. Chivers, Esquire  
312 Boulevard of the Allies, Suite 600  
Pittsburgh, PA 15222

/s/ Mark Goldner